

Exhibit P



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Transcript of Alireza Raissinia

Date: February 14, 2025

Case: Headwater Research LLC -v- Verizon/T-Mobile/AT&T/Samsung

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Transcript of Alireza Raissinia
Conducted on February 14, 2025

1 (1 to 4)

1	3
1 IN THE UNITED STATES DISTRICT COURT	1 Video Deposition of ALIREZA RAISSINIA,
2 FOR THE EASTERN DISTRICT OF TEXAS	2 conducted virtually,
3 MARSHALL DIVISION	3
4 -----x	4
5 HEADWATER RESEARCH LLC, :	5
6 Plaintiff, :	6
7 v. : Case No.:	7
8 T-MOBILE USA, INC. and : 2:23-cv-00379-JRG-RSP	8 Pursuant to notice, before Judith E.
9 SPRINT CORP., : (Lead Case)	9 Bellinger, Registered Professional Reporter,
10 Defendants. :	10 Certified Realtime Reporter, and E-Notary Public
11 -----x	11 in and for the State of Maryland.
12 HEADWATER RESEARCH LLC, :	12
13 Plaintiff, :	13
14 v. : Case No.:	14
15 T-MOBILE USA, INC. and : 2:23-cv-00377-JRG-RSP	15
16 SPRINT CORP., : (Member Case	16
17 Defendants. :	17
18 -----x	18
19 (Caption continued on next page)	19
20	20
21 Video Deposition of ALIREZA RAISSINIA	21
22 Conducted Virtually	22
23 Friday, February 14, 2025	23
24	24
25	25
2	4
1 (Caption continued from previous page)	1 A P P E A R A N C E S
2 12:36 p.m. EST	2
3 Job No.: 571075	3 ON BEHALF OF THE PLAINTIFF:
4 Pages: 1 - 183	4 REZA MIRZAIE, ESQUIRE
5 Stenographically reported by: Judith E. Bellinger,	5 KRISTOPHER R. DAVIS, ESQUIRE
6 RPR, CRR, CSR-TX, CCR-WA, CCR-NM	6 RUSS AUGUST & KABAT
7 -----x	7 12424 WILSHIRE BOULEVARD
8 HEADWATER RESEARCH LLC, :	8 Los Angeles, CA 90025
9 Plaintiff, :	9 310.826.7474
10 v. : Case No.:	10
11 VERIZON COMMUNICATIONS : 2:23-CV-00352-JRG-RSP	11 ON BEHALF OF DEFENDANTS VERIZON AND T-MOBILE:
12 INC.; CELLCO PARTNERSHIP : 2:23-cv-00397-JRG-RSP	12 ANDREW ROBB, ESQUIRE
13 d/b/a VERIZON WIRELESS; : LEAD CASE	13 GIBSON, DUNN & CRUTCHER LLP
14 VERIZON CORPORATE SERVICES: :	14 310 University Avenue
15 GROUP INC., : 2:23-cv-00398-JRG-RSP	15 Palo Alto, CA 94301-1744
16 Defendants. :	16 650.849.5334
17 -----x	17
18 HEADWATER RESEARCH LLC, :	18 ON BEHALF OF THE DEFENDANT AT&T:
19 Plaintiff, :	19 KEVIN P. HESS, ESQUIRE
20 v. : Case No.:	20 MCKOOL SMITH
21 AT&T SERVICES, INC., AT&T : 2:23-cv-641-JRG-RSP	21 303 Colorado Street
22 MOBILITY, LLC AND AT&T : :	22 Suite 2100
23 CORP., : :	23 Austin, TX 78701
24 Defendants. : :	24 512.692.8749
25 -----x	25

Transcript of Alireza Raissinia
Conducted on February 14, 2025

2 (5 to 8)

5	7
1 A P P E A R A N C E S C O N T I N U E D	1 C O N T E N T S
2	2 EXAMINATION OF ALIREZA RAISSINIA PAGE
3 ON BEHALF OF THE SAMSUNG DEFENDANTS IN THE	3 By Mr. Robb 10
4 641 CASE:	4 By Mr. Hess 106
5 JARED HARTZMAN, ESQUIRE	5 By Mr. Robb 120
6 FISH & RICHARDSON P.C.	6 By Mr. Hartzman 127
7 1000 Maine Avenue, SW	7 By Mr. Mirzaie 163
8 Suite 1000	8 E X H I B I T S
9 Washington, DC 20024	9 (Attached to the transcript)
10 202.783.5070	10 Exhibits: PAGE
11 - AND -	11 Exhibit 1 LinkedIn profile of Ali Raissinia 18
12 TAE HONG, ESQUIRE	12 Exhibit 2 T-Mobile my Touch 3G Slide User 48
13 FISH & RICHARDSON	13 guide, Bates Numbers TMO_H200043878
14 1180 Peachtree Street, NE	14 - 4059
15 21st Floor	15 Exhibit 3 "Apple iOS 7:app developers explain 56
16 Atlanta, GA 30309	16 its key features and implications"
17 404.724.2759	17 Exhibit 4 United States Patent Number 87
18	18 9,215,613 B2
19 ON BEHALF OF THE DEPONENT:	19 Exhibit 5 United States Patent Number 95
20 DONN WASLIF, ESQUIRE	20 8,589,541 B2
21 MORGAN FRANICH FREDKIN SIAMAS & KAYS LLP	21 Exhibit 6 United States Patent Number 136
22 333 WEST SAN CARLOS STREET	22 9,179,359 B2
23 Suite 1050	23
24 San Jose, CA 95110	24
25 408.288.8288	25
6	8
1 A P P E A R A N C E S C O N T I N U E D	1 P R O C E E D I N G S
2	2
3 ALSO PRESENT:	3 THE VIDEOGRAPHER: Here begins Media
4 Philip Astor, Videographer	4 Number 1 in the videotaped deposition of
5 Harut Akopyan, Planet Depos Technician	5 Alireza Raissinia, in the matter of
6	6 Headwater Research, LLC v. Verizon/T-Mobile/AT&T,
7	7 and Headwater Research, LLC v. Samsung Electronics
8	8 Co, Limited, et al., in the United States District
9	9 Court for the Eastern District of Texas, Marshall
10	10 Division, Case Numbers 2:23-CV-00352, 379, 392
11	11 [sic], and 641 JRG-RSP.
12	12 Today's date is February 14th, 2025.
13	13 The time on the video monitor is 12:36.
14	14 The remote videographer today is Philip
15	15 Astor, representing Planet Depos.
16	16 All parties of this video deposition
17	17 are attending remotely.
18	18 Would counsel, please, voice-identify
19	19 themselves and state whom they represent.
20	20 MR. ROBB: Andrew Robb, Gibson Dunn,
21	21 for Verizon and T-Mobile.
22	22 MR. HESS: Kevin Hess, McKool Smith,
23	23 for AT&T.
24	24 For the record, I didn't hear the
25	25 397 case in the read-on, and that's the AT&T case,

Transcript of Alireza Raissinia
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3 (9 to 12)

<p>9</p> <p>1 Philip.</p> <p>2 MR. HARTZMAN: Jared Hartzman for Fish</p> <p>3 & Richardson for the Samsung defendants in the</p> <p>4 641 case.</p> <p>5 With me on the Zoom is my colleague</p> <p>6 Tae Hong.</p> <p>7 MR. WASLIF: Donn Waslif, representing</p> <p>8 the witness, Alireza Raissinia.</p> <p>9 MR. MIRZAIE: Reza Mirzaie, plaintiff</p> <p>10 Headwater. With me on the line is my partner</p> <p>11 Kris Davis.</p> <p>12 THE VIDEOGRAPHER: The court reporter</p> <p>13 today is Judy Bellinger, representing Planet</p> <p>14 Depos.</p> <p>15 The witness will now be sworn.</p> <p>16 ALIREZA RAISSINIA,</p> <p>17 being first duly sworn, was examined</p> <p>18 and testified as follows:</p> <p>19 MR. ROBB: Before I begin, I'll also</p> <p>20 note for the record that I believe that in the</p> <p>21 read-on, the 379 case for T-Mobile was mentioned</p> <p>22 but the 377 case was not, so I'll just note it's</p> <p>23 for both of those related cases.</p> <p>24 EXAMINATION BY COUNSEL FOR THE DEFENDANTS VERIZON</p> <p>25 AND T-MOBILE</p>	<p>11</p> <p>1 before you answer. It helps the court reporter if</p> <p>2 we do not speak over one another. And I will try</p> <p>3 to do the same, where I don't speak over your</p> <p>4 answer with the next question.</p> <p>5 Is that fair?</p> <p>6 A Fair.</p> <p>7 Q It's important, for the transcript,</p> <p>8 that you answer each question verbally and avoid</p> <p>9 words such as -- or sounds such as uh-huh.</p> <p>10 Is that fair?</p> <p>11 A Fair.</p> <p>12 Q And your counsel may object to</p> <p>13 particular questions. Unless he instructs you not</p> <p>14 to answer, you should go ahead and answer,</p> <p>15 provided you understand the question.</p> <p>16 Do you agree with that?</p> <p>17 A I do.</p> <p>18 Q Is there any reason why you cannot give</p> <p>19 truthful testimony today?</p> <p>20 A No reason.</p> <p>21 Q Do you have any question about anything</p> <p>22 I've just said?</p> <p>23 A No.</p> <p>24 Q I understand you were deposed once</p> <p>25 before in a case brought by Headwater against</p>
<p>10</p> <p>1 BY MR. ROBB:</p> <p>2 Q Good morning, Mr. Raissinia.</p> <p>3 A Good morning.</p> <p>4 Q Could you, please, state your full name</p> <p>5 for the record?</p> <p>6 A Yeah. Alireza Raissinia, my full name.</p> <p>7 Q And you understand you're under oath</p> <p>8 today?</p> <p>9 A Correct, I do.</p> <p>10 Q And you understand you have an</p> <p>11 obligation to provide truthful and accurate</p> <p>12 testimony today?</p> <p>13 A I do.</p> <p>14 Q If you find a question is unclear,</p> <p>15 please, let me know and I will attempt to clarify</p> <p>16 it. Otherwise, I will assume you understand the</p> <p>17 question.</p> <p>18 Is that fair?</p> <p>19 A That is fair.</p> <p>20 Q You can request breaks as needed. But</p> <p>21 I ask that you not request a break when a question</p> <p>22 is pending.</p> <p>23 Is that fair?</p> <p>24 A Correct. That's fair.</p> <p>25 Q Please wait until I finish my question</p>	<p>12</p> <p>1 Samsung; is that right?</p> <p>2 A Correct.</p> <p>3 Q Have you reviewed the transcript for</p> <p>4 your deposition in that case?</p> <p>5 A I did. Close to a year ago, yeah.</p> <p>6 When it was first issued.</p> <p>7 Q And based on your review of that</p> <p>8 transcript, is any of the testimony you gave in</p> <p>9 that deposition inaccurate?</p> <p>10 MR. WASLIF: Vague. Overbroad.</p> <p>11 Go ahead.</p> <p>12 A There were some typos and clarification</p> <p>13 that needed to happen that I suggested, and that's</p> <p>14 it.</p> <p>15 Q Were there any substantive inaccuracies</p> <p>16 in the testimony that you gave in the Samsung</p> <p>17 litigation?</p> <p>18 A Can you repeat the question?</p> <p>19 Q Were there any substantive inaccuracies</p> <p>20 in the testimony you gave in the Samsung</p> <p>21 litigation?</p> <p>22 A No.</p> <p>23 Q Other than your testimony in the</p> <p>24 Samsung deposition, have you ever been deposed</p> <p>25 before?</p>

Transcript of Alireza Raissinia
Conducted on February 14, 2025

4 (13 to 16)

<p>13</p> <p>1 A I don't recall. I might have.</p> <p>2 Q Have you ever given -- have you ever</p> <p>3 testified in court before?</p> <p>4 A No. Not in court.</p> <p>5 Q Have you ever given sworn written</p> <p>6 testimony before, for example, in the form of a</p> <p>7 declaration or affidavit?</p> <p>8 A No.</p> <p>9 Q And other than the Samsung deposition</p> <p>10 last year, you don't remember, one way or the</p> <p>11 other, of whether you've ever been deposed before;</p> <p>12 is that correct?</p> <p>13 A That's correct. I don't.</p> <p>14 Q What do you know about this litigation,</p> <p>15 specific litigation against -- brought by</p> <p>16 Headwater against Verizon and T-Mobile?</p> <p>17 MR. WASLIF: Vague, overbroad.</p> <p>18 Can you narrow the question, Counsel?</p> <p>19 MR. ROBB: Counsel, as you know, in</p> <p>20 this district, you have to restrict the questions</p> <p>21 [sic] to form.</p> <p>22 MR. WASLIF: Object to form.</p> <p>23 Overbroad. And it also calls for privileged</p> <p>24 communication because you didn't eliminate that.</p> <p>25 So I don't know what you mean by the</p>	<p>15</p> <p>1 A I mentioned it to my wife.</p> <p>2 Q Is there anyone else you spoke to about</p> <p>3 your deposition?</p> <p>4 A No.</p> <p>5 Q Since the Samsung -- let me back up.</p> <p>6 When was the Samsung deposition?</p> <p>7 A I recollect it was about a year and a</p> <p>8 few months back.</p> <p>9 Q Since the Samsung deposition, have you</p> <p>10 spoken with anyone about any issues relating to</p> <p>11 Headwater?</p> <p>12 MR. WASLIF: With the exception of the</p> <p>13 attorney-client communications you've had, he's</p> <p>14 already covered.</p> <p>15 Q Let me ask a more precise question.</p> <p>16 Setting aside the conversations you had</p> <p>17 in preparation for your deposition today, with</p> <p>18 your two attorneys, have you had any conversations</p> <p>19 with anyone, for any reason, about Headwater since</p> <p>20 the Samsung deposition?</p> <p>21 A If the conversation means talking to</p> <p>22 someone, no.</p> <p>23 Q Okay. Did you have written</p> <p>24 conversations with anyone?</p> <p>25 A I had one text exchange with Greg</p>
<p>14</p> <p>1 litigation. It's pretty broad.</p> <p>2 MR. ROBB: Counsel, you have to limit</p> <p>3 your objections to form in this district.</p> <p>4 MR. WASLIF: And you're not to include</p> <p>5 in your answer anything that we discussed. That's</p> <p>6 attorney-client privilege, Mr. Raissania.</p> <p>7 Q With counsel's instruction, what do you</p> <p>8 know about the lawsuit that Headwater has brought</p> <p>9 against Verizon and T-Mobile?</p> <p>10 MR. WASLIF: Same objection.</p> <p>11 A Nothing.</p> <p>12 Q Nothing. Okay.</p> <p>13 What did you do to prepare for your</p> <p>14 deposition today?</p> <p>15 A I did nothing. I only talked to Donn</p> <p>16 and David. For about ten minutes with Donn, half</p> <p>17 an hour with David.</p> <p>18 Q And are Donn and David your attorneys?</p> <p>19 A Correct.</p> <p>20 Q Did you review any documents in</p> <p>21 preparation for your deposition today?</p> <p>22 A No.</p> <p>23 Q Other than meeting with your attorneys,</p> <p>24 Donn and David, did you talk with anyone else</p> <p>25 about your deposition that was happening today?</p>	<p>16</p> <p>1 Raleigh.</p> <p>2 Q Were there any other written</p> <p>3 communications with anyone --</p> <p>4 A No.</p> <p>5 Q Let me finish the question.</p> <p>6 Were there any other written</p> <p>7 communications you had with anyone following the</p> <p>8 Samsung deposition?</p> <p>9 A No.</p> <p>10 Q What did you discuss with Dr. Raleigh</p> <p>11 in that written communication you referred to?</p> <p>12 A He asked me a question, specifically,</p> <p>13 whether I have received my Ph.D. degree, and I</p> <p>14 told him, no, I got my -- I worked on -- I did my</p> <p>15 coursework but I didn't get the degree. That's</p> <p>16 it.</p> <p>17 Q Was there any other subject matter</p> <p>18 discussed in your conversation with Dr. Raleigh</p> <p>19 that you're referring to?</p> <p>20 A No.</p> <p>21 Q Did you bring any documents with you</p> <p>22 today?</p> <p>23 A No.</p> <p>24 Q Where are you currently?</p> <p>25 A I'm in Bay Area. I live in Bay Area.</p>

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5 (17 to 20)

<p>17</p> <p>1 Q And are you physically in your house 2 right now? Where are you? 3 A No, no. I'm in my office. 4 Q In your home office? 5 A Work office. Work office. At 6 Qualcomm. 7 Q So you're at Qualcomm right now? 8 A Correct. 9 Q And is your counsel in the building 10 with you? 11 A No. 12 MR. WASLIF: No. 13 Q I would ask that while we're on the 14 record, that you refrain from having any 15 communications with anyone, including your 16 counsel, unless it's actually via this Zoom, i.e., 17 for example, please don't email your counsel while 18 we're on the record. 19 Can you agree with that? 20 A Sure. 21 Q Mr. Raissinia, I have uploaded -- 22 actually, sorry. Strike that. 23 I'm going to upload it properly marked. 24 You can ignore the PDF I just uploaded. 25 MR. WASLIF: Andrew, I couldn't hear</p>	<p>19</p> <p>1 Q Is what I've uploaded as Exhibit 1 a 2 true and correct copy of your LinkedIn profile? 3 A Okay. Yeah. Yes, it is. 4 Q Okay. Thank you. 5 Does your LinkedIn profile accurately 6 capture your work history? 7 A Yeah, pretty much. Yeah. 8 Q Are there any inaccuracies in your 9 LinkedIn profile? 10 A Not really. I think -- I haven't 11 looked at it for a long time, but I -- Qualcomm, 12 Headwater, Headwater. 13 MR. WASLIF: Read it to yourself. 14 Because the court reporter's going to take down 15 everything. 16 A Yes, it's a pretty good representative. 17 Correct. It's correct. 18 Q So you were at Qualcomm from 2006 until 19 2009; is that right? 20 A Correct. 21 Q And then in 2009, you left Qualcomm to 22 join Headwater and ItsOn, correct? 23 A Yes. 24 Q And you were with both Headwater and 25 ItsOn for, approximately, one year, and in 2010,</p>
<p>18</p> <p>1 you. I'm sorry. 2 MR. ROBB: I uploaded the PDF before I 3 designated it Exhibit 1, so I'm just re-uploading 4 it. 5 PLANET DEPOS TECHNICIAN: Do you want 6 me to open it? 7 MR. ROBB: No. Hold on just one 8 second. 9 PLANET DEPOS TECHNICIAN: Sorry. 10 (Exhibit 1 marked for identification 11 and attached to the transcript.) 12 BY MR. ROBB: 13 Q Mr. Raissania, I had -- I keep calling 14 you Mr. Raissinia. Is it correct that you 15 still -- you don't have a Ph.D.; is that right? 16 A Right. 17 Q So, Mr. Raissania, I have uploaded, as 18 a document marked as Exhibit 1, a PDF which I 19 believe is of your LinkedIn profile, retrieved 20 this month. 21 Can you, please, let me know when you 22 open it. 23 A The Exhibit 1, EX1? 24 Q EX1, yes. 25 A Okay.</p>	<p>20</p> <p>1 you left ItsOn and then only worked at Headwater 2 through 2011, correct? 3 A Yeah. I guess, physically, you could 4 say I left, but I was -- I mainly focused on the 5 Headwater work, as opposed to ItsOn, yes. 6 Q Then 2011, you went back to Qualcomm 7 and left Headwater, right? 8 A Right. 9 Q And you've been at Qualcomm ever since? 10 A Correct. 11 Q Since -- do you recall when, in 2011, 12 you left Headwater? 13 A I think somewhere around -- I joined 14 Qualcomm January, if I remember correctly. Early 15 January. I don't know, January 8, 9, something 16 like that. 17 I probably had left Headwater before 18 Christmas or something like that. 19 Q After leaving Headwater at the end of 20 2011 and joining Qualcomm in the beginning of 21 2012, have you had any substantive interactions or 22 contributions to Headwater? 23 A No. Not at all. 24 Q Are you aware of what ultimately 25 happened to ItsOn?</p>

<p>21</p> <p>1 MR. WASLIF: Objection. Vague.</p> <p>2 A No. I don't quite know what happened.</p> <p>3 Q Do you have a general understanding</p> <p>4 that ItsOn no longer exists?</p> <p>5 A Correct. That understanding is</p> <p>6 correct.</p> <p>7 Q Beyond the understanding that ItsOn no</p> <p>8 longer exists, do you have any understanding of</p> <p>9 the details of what caused ItsOn to shut down or</p> <p>10 the process by which ItsOn shut down?</p> <p>11 A Not at all.</p> <p>12 Q Have you had any insight into inner</p> <p>13 works of Headwater since you left the company in</p> <p>14 2011?</p> <p>15 A No.</p> <p>16 Q Have you been --</p> <p>17 MR. WASLIF: Pardon me. One second,</p> <p>18 Andrew.</p> <p>19 Madam court reporter, are you getting</p> <p>20 my objections or can you hear me?</p> <p>21 Q Mr. Raissinia, I would suggest that --</p> <p>22 your counsel can tell you the same thing, but I'll</p> <p>23 tell you. If you could just wait one second</p> <p>24 because you and Mr. Waslif are talking over each</p> <p>25 other.</p>	<p>23</p> <p>1 MR. WASLIF: Same objections.</p> <p>2 A No.</p> <p>3 Q Do you have any view or information,</p> <p>4 sitting here today, about whether AT&T infringes</p> <p>5 any of Headwater's patents?</p> <p>6 MR. WASLIF: Same objections.</p> <p>7 A No.</p> <p>8 Q Do you have any view or information,</p> <p>9 sitting here today, about whether Samsung</p> <p>10 infringes any of Headwater's patents?</p> <p>11 MR. WASLIF: Same objections.</p> <p>12 A No.</p> <p>13 Q Sitting here today, do you have any</p> <p>14 view or information about whether any of the</p> <p>15 products or services offered by Samsung or Apple</p> <p>16 or Google infringes any of Headwater's patents?</p> <p>17 MR. WASLIF: Form. Calls for an</p> <p>18 opinion, which he's not here to give.</p> <p>19 Go ahead.</p> <p>20 A No.</p> <p>21 Q When did you first meet Dr. Raleigh?</p> <p>22 A 1995. I don't remember exactly the</p> <p>23 month or what. But somewhere around that time.</p> <p>24 Q And did you interact with Dr. Raleigh</p> <p>25 when you were at Qualcomm in the 2006 to 2009</p>
<p>22</p> <p>1 MR. WASLIF: Thank you for that,</p> <p>2 Counsel.</p> <p>3 Q Since leaving Headwater in 2011, have</p> <p>4 you had any involvement, whatsoever, in the</p> <p>5 prosecution of any of Headwater's patents?</p> <p>6 A No.</p> <p>7 Q Since leaving Headwater in 2011, have</p> <p>8 you had any discussions with any individuals about</p> <p>9 the prosecution of any of Headwater's patents?</p> <p>10 A No.</p> <p>11 Q Since leaving Headwater in 2011, have</p> <p>12 you had any discussions with anyone relating to</p> <p>13 alleged infringement by industry participants of</p> <p>14 any Headwater patents?</p> <p>15 MR. WASLIF: Object to form.</p> <p>16 A No.</p> <p>17 Q Do you have any view or information,</p> <p>18 sitting here today, about whether Verizon</p> <p>19 infringes any of Headwater's patents?</p> <p>20 MR. WASLIF: Object to form. Calls for</p> <p>21 an expert opinion, which he's not here to give.</p> <p>22 A No. I don't even know.</p> <p>23 Q Do you have any view or information,</p> <p>24 sitting here today, about whether T-Mobile</p> <p>25 infringes any of Headwater's patents?</p>	<p>24</p> <p>1 stint?</p> <p>2 A Very little.</p> <p>3 Q While you were at Qualcomm in that 2006</p> <p>4 to 2009 period, what were your interactions with</p> <p>5 Dr. Raleigh?</p> <p>6 MR. WASLIF: Objection. Vague. Form.</p> <p>7 A If any, it was not work related because</p> <p>8 he was actually in San Diego and I was in Bay Area</p> <p>9 and I was focused on stuff that he was not. He</p> <p>10 was doing something different, apparently.</p> <p>11 Q At a high level, what were the kinds of</p> <p>12 things you were working on at Qualcomm from 2006</p> <p>13 to 2009?</p> <p>14 A I was working on or we were working on?</p> <p>15 I wasn't working with Greg Raleigh on anything. I</p> <p>16 was working on engineering technology.</p> <p>17 Q I was asking you what you were working</p> <p>18 on. So at a high level, what were you working on</p> <p>19 at Qualcomm from 2006 to 2009?</p> <p>20 MR. WASLIF: Object to the form.</p> <p>21 And the question calls for at a high</p> <p>22 level, as opposed to anything that would be</p> <p>23 confidential to Qualcomm.</p> <p>24 A It's more engineering technology.</p> <p>25 Q What caused you to leave Qualcomm in</p>

<p>173</p> <p>1 A Yes.</p> <p>2 Q Do you remember he asked four or</p> <p>3 five -- he asked that question four or five times</p> <p>4 in a row?</p> <p>5 Do you recall that?</p> <p>6 MR. ROBB: Object to form.</p> <p>7 A Yes.</p> <p>8 Q But if an app can be woken up in the</p> <p>9 background and make API calls, then there's</p> <p>10 certainly something for a policy to apply to and</p> <p>11 block, right?</p> <p>12 MR. ROBB: Object to form.</p> <p>13 A Correct.</p> <p>14 Q And if there is a policy blocking</p> <p>15 network access for the app, that's indicating that</p> <p>16 there's some periods when the app can wake up so</p> <p>17 you want to have the policy in place, fair?</p> <p>18 MR. ROBB: Object to form.</p> <p>19 A Fair.</p> <p>20 Q Now, earlier today, Mr. Robb also asked</p> <p>21 if Headwater developed any real -- strike that.</p> <p>22 Earlier today Mr. Robb asked, four or</p> <p>23 five times, whether Headwater developed any real</p> <p>24 technology or just wrote ideas down on paper.</p> <p>25 Do you recall that?</p>	<p>175</p> <p>1 Q Anyone who says otherwise would be</p> <p>2 wrong, right?</p> <p>3 MR. ROBB: Object to form. And I'll</p> <p>4 make a standing scope objection.</p> <p>5 A Correct.</p> <p>6 Q I believe earlier you said that Greg</p> <p>7 was the driver on certain ideas and interactions</p> <p>8 with certain companies.</p> <p>9 Do you recall that?</p> <p>10 A Yes, I did say that. I'm not sure</p> <p>11 that -- yeah, I did.</p> <p>12 Q So, with respect to certain meetings</p> <p>13 with various carrier companies, it's better to ask</p> <p>14 him or someone else at ItsOn and not you, correct?</p> <p>15 A Correct.</p> <p>16 Q And I think you got questions today</p> <p>17 about whether you're aware of any misconduct and</p> <p>18 other synonyms of misconduct by the carriers.</p> <p>19 Do you recall that?</p> <p>20 A I do.</p> <p>21 MR. ROBB: Object to form.</p> <p>22 Q And you haven't reviewed, you haven't</p> <p>23 been provided or reviewed any of the confidential</p> <p>24 emails or other documents from the carriers in</p> <p>25 this case, right?</p>
<p>174</p> <p>1 MR. ROBB: Object to form.</p> <p>2 A I do.</p> <p>3 Q Do you recall him asking that same</p> <p>4 question four or five times in a row, too?</p> <p>5 MR. ROBB: Object to form.</p> <p>6 Argumentative. Form.</p> <p>7 A I do.</p> <p>8 Q You just meant that Headwater did not</p> <p>9 develop product development, correct?</p> <p>10 MR. ROBB: Object to form.</p> <p>11 A Correct.</p> <p>12 Q You're not suggesting that Headwater</p> <p>13 didn't develop real technology in its patents, are</p> <p>14 you?</p> <p>15 MR. ROBB: Object to form.</p> <p>16 A No.</p> <p>17 Q And you're proud of your patents,</p> <p>18 correct?</p> <p>19 A Absolutely.</p> <p>20 Q And, by the way, the patents that list</p> <p>21 you and Dr. Greg Raleigh, and possibly other</p> <p>22 inventors, you all, as inventors, did not develop</p> <p>23 that during your time at Qualcomm, correct?</p> <p>24 MR. ROBB: Object to form and scope.</p> <p>25 A Correct.</p>	<p>176</p> <p>1 A Correct.</p> <p>2 Q And even with respect to your time at</p> <p>3 ItsOn, there are other people, as we just</p> <p>4 established, who are better to ask questions about</p> <p>5 that topic, such as Dr. Greg Raleigh, correct?</p> <p>6 MR. ROBB: Object to form.</p> <p>7 A Correct.</p> <p>8 Q You were also asked questions about,</p> <p>9 early this morning, about the goal of Headwater's</p> <p>10 solutions.</p> <p>11 Do you recall that?</p> <p>12 MR. ROBB: Object to form.</p> <p>13 A Yes, I did remember.</p> <p>14 Q And you didn't have any of the patents</p> <p>15 in front of you during this portion of the day, in</p> <p>16 the morning, when you were asked those questions,</p> <p>17 I'll just represent that.</p> <p>18 So, your testimony about the goals of</p> <p>19 the solution wasn't about any specific claim of</p> <p>20 any patent, correct?</p> <p>21 MR. ROBB: Object to form.</p> <p>22 A Correct.</p> <p>23 Q And you were only there in 2009 and</p> <p>24 2010; is that right?</p> <p>25 A I believe so. I was there a couple</p>

<p>177</p> <p>1 years, yeah.</p> <p>2 Q And any other time periods, it's better</p> <p>3 just to ask Dr. Raleigh; is that fair?</p> <p>4 A Absolutely, yeah.</p> <p>5 Q And even in that time period, you</p> <p>6 weren't speaking on behalf of Dr. Raleigh; you</p> <p>7 were just speaking on behalf of yourself, correct?</p> <p>8 A Correct.</p> <p>9 Q You were also asked questions about</p> <p>10 Headwater's motivations in 2009 and '10, and I</p> <p>11 just had some of the same questions.</p> <p>12 You were just speaking on behalf of</p> <p>13 yourself from 2009 to 2010, fair?</p> <p>14 MR. ROBB: Object to form.</p> <p>15 A Correct.</p> <p>16 Q You were also asked a few questions</p> <p>17 about prior art today. And similar to my</p> <p>18 questions from a few minutes ago, you haven't</p> <p>19 compared the construed claim language in any of</p> <p>20 the claims in any of these patents to the prior</p> <p>21 art, correct, in preparation for your testimony</p> <p>22 today, correct?</p> <p>23 A No, not for testimony today.</p> <p>24 Q Now while you were working at Headwater</p> <p>25 and/or ItsOn in 2009 to 2010, you weren't involved</p>	<p>179</p> <p>1 sure.</p> <p>2 Q And do you think his inventions have</p> <p>3 helped the world, his inventions over time?</p> <p>4 MR. ROBB: Object to form.</p> <p>5 A I would hope so.</p> <p>6 Q Do you think he's a smart guy?</p> <p>7 MR. ROBB: Object to form.</p> <p>8 A Yeah, I do.</p> <p>9 Q You were also asked some questions</p> <p>10 today about the application layer or the API layer</p> <p>11 for the ItsOn development.</p> <p>12 Do you recall that?</p> <p>13 MR. ROBB: Object to form.</p> <p>14 A Yeah.</p> <p>15 Q And I think you testified, and correct</p> <p>16 me if I'm wrong, that James Lavine was a better</p> <p>17 person to ask about those questions, correct?</p> <p>18 A Oh, yeah.</p> <p>19 Q And why is that?</p> <p>20 A Well, he was very intuitive of the</p> <p>21 software development and the structural libraries</p> <p>22 and the way you, you know, call a module and hand</p> <p>23 over parameters and middleware, the firmware, he</p> <p>24 was very familiar with it. I think that knowledge</p> <p>25 was valuable to putting all this together so it</p>
<p>178</p> <p>1 in every single ItsOn project or on every single</p> <p>2 ItsOn email, correct?</p> <p>3 A Absolutely correct.</p> <p>4 Q Would Dr. Raleigh be a better person to</p> <p>5 ask about the -- perhaps, certain projects you</p> <p>6 weren't involved in or meetings that you weren't</p> <p>7 involved in?</p> <p>8 MR. ROBB: Object to form.</p> <p>9 A My recommendation, Dr. Raleigh would be</p> <p>10 the right person to talk to.</p> <p>11 Q And we talked about this a little bit</p> <p>12 in your past deposition, but I believe you</p> <p>13 testified that Dr. Raleigh has a unique way of</p> <p>14 solving problems in the various technical fields,</p> <p>15 correct?</p> <p>16 MR. ROBB: Object to form.</p> <p>17 A Correct. My view, yeah.</p> <p>18 Q Can you explain that a little bit more?</p> <p>19 MR. ROBB: Object to form.</p> <p>20 A Well, he tends to have broad knowledge</p> <p>21 and have a way of putting different ideas together</p> <p>22 and to come with an impactful, I'll call it,</p> <p>23 impactful and wide, broad patent ideas and</p> <p>24 innovations. So, he has that tendency, yeah. I</p> <p>25 mean, I definitely enjoyed working with him for</p>	<p>180</p> <p>1 becomes a synthesizable design.</p> <p>2 The idea can be, in fact, implemented</p> <p>3 in an efficient way. Like I just said, there's</p> <p>4 only -- devices have limited resources. Not like</p> <p>5 we can just keep writing code.</p> <p>6 Q Right.</p> <p>7 A You have to be cognizant to the overall</p> <p>8 CPU, memory, power, and so forth.</p> <p>9 MR. MIRZAIE: Okay. Maybe we can go</p> <p>10 off the record for five minutes. I want to</p> <p>11 streamline the rest of my questions. I think I</p> <p>12 only have a couple minutes.</p> <p>13 MR. WASLIF: Sure.</p> <p>14 THE VIDEOGRAPHER: We are going off the</p> <p>15 record at 18:36.</p> <p>16 (Recess taken.)</p> <p>17 THE VIDEOGRAPHER: We are back on the</p> <p>18 record at 18:43.</p> <p>19 MR. MIRZAIE: Mr. Raissinia, I don't</p> <p>20 have any further questions at this time.</p> <p>21 THE WITNESS: All right. Thank you.</p> <p>22 MR. WASLIF: Anybody else have any</p> <p>23 other questions?</p> <p>24 MR. ROBB: None from me.</p> <p>25 MR. HESS: None from me.</p>